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Corporation and THOMAS P. SCHMALZRIED, M.D.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (San Francisco)

JILL BRINKMAN and KEN
BRINKMAN,

Plaintiff(s),

v.

DEPUY ORTHOPAEDICS, INC.;
JOHNSON & JOHNSON SERVICES,
INC.; JOHNSON & JOHNSON, INC.;
DEPUY INTERNATIONAL LTD;
THOMAS P. SCHMALZRIED, M.D.,
THOMAS P. SCHMALZRIED, M.D., A
PROFESSIONAL CORPORATION; and
DOES 1 through 20, inclusive,

Defendants.

CASE NO. 3:12-cv-01571-JCS

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint served: March 1, 2012
Removal Date: March 29, 2012
Current Response Date: April 5, 2012
Agreed Response Date: May 5, 2012

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants Thomas P. Schmalzried, M.D., a Professional Corporation and Thomas P. Schmalzried, M.D. ("Defendants") hereby request, and Plaintiffs Jill Brinkman and Ken Brinkman ("Plaintiffs") hereby agree to Defendants' request, for an extension of time for Defendants to file a response to Plaintiffs' Complaint. Plaintiffs' Complaint was filed on

1 February 17, 2012, Defendants were served on or about March 1, 2012, and the case was
2 removed on March 29, 2012.

3
4 THE PARTIES HAVE AGREED AND HEREBY STIPULATE to extend the time for
5 Defendants to respond to May 5, 2012.

6
7 DATED: April 2, 2012

SEDGWICK LLP

8
9 By: /s/ Michael M. Walsh

10 Ralph Campillo

11 Wendy Tucker

12 Michael M. Walsh

Attorneys for Defendants

13 THOMAS P. SCHMALZRIED, M.D., A

Professional Corporation and THOMAS P.

14 SCHMALZRIED, M.D.

15 DATED: April 2, 2012

SEEGER ● SALVAS LLP

16
17
18 By: /s/ Adam R. Salvas

19 Kenneth M. Seeger

Adam R. Salvas

20 Brian J. Devine

Attorneys for Plaintiffs

21 JILL BRINKMAN and KEN BRINKMAN

Pursuant to Section X of General Order No. 45 regarding Electronic Court Filing, I hereby certify that the content of this document is acceptable to Adam R. Salvas, counsel for Plaintiffs Jill Brinkman and Ken Brinkman, and that I have obtained counsel's authorization to affix his electronic signature to this document.

DATED: April 2, 2012

SEDGWICK LLP

By: /s/ Michael M. Walsh

Ralph Campillo

Wendy Tucker

Michael M. Walsh

Attorneys for Defendant

THOMAS P. SCHMALZRIED, M.D., A

Professional Corporation and THOMAS P.
SCHMALZRIED, M.D.

Dated: April 3, 2012



CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, 801 South Figueroa Street, 19th Floor, Los Angeles, California 90017-5556. On April 2, 2012, I served the within document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT (L.R. 6-1)

- ☐ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.
- ☒ ELECTRONIC MAIL – by serving via CM/ECF to the United States District Court, Central District of California, addressing all parties appearing on the Courts ECF service list.

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I declare that I am employed in the office of a member of the bar of this court at who direction the service was made.

Executed at Los Angeles, California on April 2, 2012.

/s/Barbara Ferguson
Barbara Ferguson